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MEMO ENDORSEMENT as to Lawrence Ray, Isabella Pollok.

A Status Conference is scheduled for Wednesday, July 7, 2021 at 12:00PM and will be held remotely by Telephone. The Court will address the request for the adjourned trial date and handle the substitution of counsel for defendant Pollok. Parties are reminded to dial into the Court's teleconference line at 888-251-2909 and use access code 2123101. The Status Conference previously scheduled for July 16, 2021 at 12:00PM is CANCELLED.

7/1/2021 SO ORDERED.

June 30, 2021

Via ECF


LEWIS J. LIMAN
United States District Judge

Hon. Lewis J. Liman, United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Hon.

Re: USA v. Isabella Pollok
20-Cr-110 (LJL)

Dear Judge Liman:

I, along with Richard Lind, Esq., represent Ms. Pollok in the above matter. We are currently scheduled to commence trial on September 20, 2021; we are expected to advise this Court of proposed motions by tomorrow, July 1, 2021.

Ms. Pollok was arraigned in this matter on February 9, 2021. Her prior attorney was relieved on April 16, and Richard Lind, Esq. was appointed to represent her. Mr. Lind's request to add me as co-counsel was granted on April 23, 2021.

The discovery in this matter is beyond voluminous. It is approximately 12 terabytes of materials, and includes e-mails, text messages, videos, and other materials relative to the facts that could be elicited at trial. I have consulted with Emma Greenwood, Esq., as a Coordinating Discovery Attorney in an attempt to organize the materials to be reviewed. I have received the bulk of the materials, with more to be delivered shortly.

Hon. Lewis J. Liman, United States District Judge

June 30, 2021

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More recently, as you know, Mr. Lind has asked to be relieved. With that in mind, I am seeking an adjournment of the trial. Given the sheer volume of material provided to date, it is practically impossible to review the discovery and prepare for trial in the time remaining. I have only been involved in the case since late April. Now, with Mr. Lind being relieved, and needing to bring another attorney into the case as co-counsel, the need for an adjournment of the trial is even more pressing.

I have spoken with Jill Shellow, Esq., and she is willing to accept the assignment as co-counsel in this case. Ms. Shellow is a member of the CJA panel for the Southern District. I have also consulted with counsel for the co-defendant: both the co-defendant and his legal team consent to an adjournment until February of 2021. In addition, the Government has no objection to the requested postponement.

Accordingly, I am respectfully requesting that the trial be adjourned until early in Q2 of 2022. In addition, I am requesting that we be given until July 30, 2021 to advise this Court of proposed pre-trial motions to be filed on behalf of Ms. Pollok.

Thank you for your consideration in this matter.

Very truly yours,



David K. Bertan

DKB

cc: AUSA Mollie Bracewell (Via ECF)
AUSA Danielle Sassoon (Via ECF)
AUSA Lindsey Keenan (Via ECF)
Richard Lind, Esq. (Via ECF)
Jacob Mitchell, Esq. (Via ECF)
Peggy Cross-Goldenberg, Esq. (Via ECF)
Allegra Glashausser, Esq. (Via ECF)
Marne Lynn Lenox, Esq. (Via ECF)
Jill Shellow, Esq. (Via E-Mail)